

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

UNITED STATES OF AMERICA,

v.

Case No. 2:20-cr-00054

NEDELTCHO VLADIMIROV,

Defendant.

**DEFENDANT'S MOTION FOR AN EXTENSTION OF
TIME TO FILE SENTENCING MEMORANDUM**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and moves this Honorable Court to Extend the present deadline of January 5, 2022, to file Sentencing Memorandum to January 7, 2022. In support thereof, the Defendant states as follows:

1. Defendant's counsel has been ill during the holidays.
2. Defendant's counsel needs additional time to file a proper Sentencing Memorandum.
3. An extension of an additional two (2) days would not prejudice any party in this matter.

THEREFORE, the Defendant moves this Honorable Court to extend by an additional two (2) days to January 7, 2022, to file his Sentencing Memorandum and for such other and further relief as this Court deems just.

NEDELTCHO VLADIMIROV

By Counsel.

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon

Timothy J. LaFon (#2123)
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Phone: (304)344-4440
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing **“Defendant’s Motion for An Extension of Time to File Sentencing Memorandum”** has been served upon all parties via the Court’s electronic filing system on the 4th day of January, 2022:

Andrew Tessman, Esquire
United States Attorney’s Office
P.O. Box 1713
Charleston, West Virginia 25326

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
Timothy J. LaFon (#2123)
Attorney for Defendant

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